

- Plaintiff, a qualified individual with a disability, has been subjected to discriminatory actions by Defendants in violation of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.
- Defendants continued discriminatory actions have caused Plaintiff severe emotional distress and have obstructed his ability to continue his education and professional development.
- Immediate court intervention is necessary to prevent further irreparable harm to Plaintiff.

III. LEGAL STANDARD

A TRO is warranted when the moving party establishes: (1) a likelihood of success on the merits; (2) irreparable harm in the absence of preliminary relief; (3) that the balance of equities tips in the movant's favor; and (4) that an injunction is in the public interest.

IV. ARGUMENT

A. Likelihood of Success on the Merits

Plaintiff is likely to succeed on the merits of his claims, as the evidence demonstrates Defendants' ongoing violation of federal disability laws and breach of their contractual obligations to provide reasonable accommodations. Plaintiff has made a prima facie showing of discrimination and retaliation based on his disability, which is supported by documented instances where Defendants failed to provide the necessary and reasonable accommodations.

B. Irreparable Harm

The continued denial of Plaintiff's rights constitutes irreparable harm. Defendants' actions have disrupted Plaintiff's education and career prospects, causing harm that cannot be rectified through damages alone. The inability to continue his educational program has significant implications on his future professional opportunities and overall well-being. The emotional and psychological toll is substantial and ongoing.

C. Balance of Equities

The balance of equities favors issuing the TRO. The harm Plaintiff faces far outweighs any potential inconvenience Defendants may experience. Plaintiff's immediate and substantial need for relief greatly surpasses any purported administrative or operational burden that Defendants might incur in complying with federally mandated accommodations.

D. Public Interest

Granting a TRO serves the public interest by upholding federal disability laws and ensuring that individuals with disabilities receive equal treatment and access to educational opportunities. The public has a vested interest in maintaining the integrity of civil rights protections and preventing discrimination within educational institutions.

V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that this Court:

1. Issue a Temporary Restraining Order Enjoining Defendants from continuing their discriminatory actions and requiring them to provide the reasonable accommodations necessary for Plaintiff to resume his education.

2. Set a hearing date for a preliminary injunction as soon as practicable.
3. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Ian H. Lucas

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Pro Se Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on this *21st* day of *November* 2024, a true and correct copy of the foregoing Motion for Temporary Restraining Order was filed electronically and served on all counsel of record via the Court's CM/ECF system.

Respectfully submitted,

/s/ Ian H. Lucas

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Pro Se Plaintiff